

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MONA MALHOTRA,)	
)	
Plaintiff,)	
v.)	Case No. 1:24-cv-04769
)	
)	Hon. Heather K. McShain
)	
CVS HEALTH, INC., CAREMARK,)	
LLC)	
)	
Defendants.)	

JOINT MOTION TO EXTEND THE CURRENT DISCOVERY DEADLINE

Pursuant to this Court’s October 7, 2025, Order (ECF 115), Plaintiff Mona Malhotra, by her attorney, Anne M. Beckert, A. Beckert at Law, and Defendants CVS Health, Inc., and Caremark LLC, (jointly “Defendants”) by their attorneys Littler Mendelson, P.C., move this Court to extend the current discovery deadline of October 15, 2025, until January 30, 2026. In support of their Joint Motion, the Parties state as follows:

1. Plaintiff Malhotra retained Counsel on September 19, 2025.
2. Plaintiff Malhotra’s new Counsel requires additional time to familiarize herself with Plaintiff’s claims against Defendants, to explore the currently available facts of this case, to fully review the pleadings, and to review the discovery requests and responses served by both parties. Further, Counsel needs additional time in order to determine whether Counsel should file a new Motion for leave to file an Amended Complaint, whether further discovery requests or responses are necessary, and to prepare for depositions.
3. Additionally, both parties would like the opportunity to explore settlement of Plaintiff Malhotra’s case independently or request a settlement conference with Magistrate Judge

McShain if they are unable to settle Plaintiff's case alone before either party expends substantial additional resources on this matter.

4. The Parties have both diligently pursued discovery. There have been two prior extensions of the discovery deadline. This is the first joint request for an extension for a discovery deadline, however, since Plaintiff Malhotra's retention of Counsel.

5. There have been extensive electronic requests and responses by all parties. The parties have resolved differences where possible. The Parties have also complied with this Court's previous Orders regarding providing certain discovery responses as necessary.

6. In part due to Plaintiff retaining new counsel, and the intent to engage in further settlement discussions, the Parties have not completed discovery, including the fact that no depositions have been taken.

7. The parties will continue to pursue settlement discussions and potentially request a settlement conference with Magistrate Judge McShain. An extension of time will assist with those discussions.

8. Given the circumstances outlined above, the Parties respectfully request that the current discovery deadline of October 15, 2025, be extended until January 30, 2026.

Dated: October 12, 2025

Respectfully submitted,

/s/ Anne M. Beckert

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